

REMARKS

The primary reference, *Krum*, is directed to a "stiffened cover" for a disk drive. See title. As shown in Figures 4 and 5, the cover 112 is stiffened with two features: first indented portion 124 and second indented portion 126. However, unlike Applicant's invention, these features are entirely inboard of the surrounding perimeter side walls 118, 119 (Figure 4). Col. 4, lines 63-64. Indeed, the outermost or "first indented portion 124 of *Krum* includes an outer boundary 132." Col. 5, lines 15-16. Thus, the outer boundary 132 forms a wall or obstruction having an axial thickness that prevents radial access to the indentations 124, 126. The outer boundaries or "load lines" 132 contribute to the rigidity of the cover 112. Col. 6, lines 9-10. In addition, *Krum*'s indentations are only located on the cover, not the base. Col. 4, lines 55-58; Col. 5, lines 9-11 and 14. Moreover, because of the focus on stiffening the cover, the locations of the stiffening features 124, 126 are independent of the location of the disk inside the drive. Col. 5, lines 46-50.

As discussed in Applicant's previous response, the secondary reference (*Serizawa*) merely erases the disks of completely conventional disk drive enclosures. There is not one word in *Serizawa* that addresses modifying the design of drive enclosures, much less to making drive enclosures more conducive to erasing disks. The Examiner cites numerous passages that generally discuss the components of the *Serizawa* disk drive. However, none of these passages actually address the design, shape, or dimensions of the enclosure itself—which goes to the heart of the present invention. *Serizawa* is cumulative prior art to Applicant's Admitted Prior Art described in the Background section of the present application. Page 2, paragraph 6; page 3, paragraph 9 – page 4, paragraph 13. Again, none of this prior art addresses the design of the enclosure.

Furthermore, other than prior art Figure 13, only Figure 10 of *Serizawa* even shows a side profile of the enclosure (cover 14 and base 12). Figure 13 shows a completely conventional

rectangular box enclosure. Figure 13 also shows a huge magnetic gap (much larger than the overall thickness of the enclosure). Figure 10 shows the contours of the enclosure design. Cover 14 is completely flat with no reduction in axial thickness. At first glance, the base 12 appears to show a reduction in axial thickness at the right. However, the cylindrical shape (not numbered) that protrudes below the right edge accommodates the disks and is drawn at the same depth or thickness as the overall thickness of the base 12. The design of the inner cylindrical wall (not numbered, but closest to the lead line of reference numeral 12) supports this argument. Finally, *Serizawa's* Figures 2 and 3 reveal a depth of insertion of the enclosure into the eraser that would require a large magnetic gap wide enough to engulf the maximum thickness of the enclosure (compare Figure 10 with Figures 2 and 3).

Accordingly, Applicant has amended Claims 1 and 9, and added a few new claims that focus on these distinguishing elements. For example, Claim 1 now requires the disk region to extend "radially from said at least a portion of the storage area to the perimeter edge of the enclosure." This feature is clearly supported by Applicant's Figures 2-4. In contrast, *Krum's* design is limited to the interior of the cover 112 which is defined inside boundary 132. Thus, Claim 1 is not anticipated by *Krum* and is in condition for allowance.

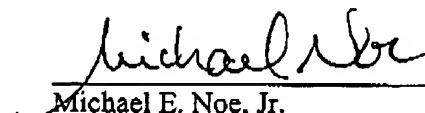
Independent Claim 9 now requires the hard disk drive assembly to be inserted into a magnetic gap of the disk erase apparatus, and "the magnetic gap defines an axial dimension that is greater than the axial thickness of the disk region and less than the axial thickness of the enclosure." This element is clearly supported by Applicant's Figure 4. In contrast, *Krum's* boundary 132 is the same thickness as its enclosure, which forces the magnetic gap of *Serizawa* to accept the full axial thickness of *Krum's* enclosure. Moreover, *Serizawa* only discloses erasers having magnetic gaps large enough for conventional drives. Thus, Claim 9 is patentable over *Krum* in view of *Serizawa*.

Each of the dependent claims further distinguish the cited references. For example, Claims 2 and 11 state that "the disk region is located on portions of both the base and the cover." Krum is very clear that the indented portions 124, 126 are *only* on its cover 112. Col. 4, lines 55-58; Col. 5, lines 9-11 and 14. *Krum's* title and all of its claims overwhelmingly support this argument. *Serizawa's* cover 14 is completely flat. Claims 5 and 14 require the disk region to have "a length extending in a radial direction, relative to the axis of the magnetic disk that spans an entire radial length of the storage area of the magnetic disk, such that the entire storage area may be erased." These structural elements are completely unsupportable by *Krum* since its indentations require boundaries 132 for rigidity and, thus, the indentations cannot extend all the way to its perimeter.

Claims 8 and 17 state, "the working magnetic gap reduces stray magnetic fields to prevent motor rotor demagnetization damage, and increases a gradient of magnetic flux density as the hard disk drive is inserted into a disk erase apparatus." This language cannot be satisfied unless the strength of the magnetic field is reduced to a lower level that is required to span only a small axial thickness in the disk region. Magnetic fields that must penetrate larger geometric enclosures (like *Serizawa*) must be stronger than required to merely erase the disks and, thus, run the inherent risk of damaging the spindle motor rotor. Finally, new Claims 18-20 incorporate all of these distinguishing elements and are readily allowable over the prior art.

It is respectfully submitted that the claims are in condition for allowance and favorable action is requested. No fee for an extension of time or other fees are believed to be required. However, in the event that one or more fees are required, please charge them to **Hitachi Global Storage Technologies' Deposit Account Number 50-2587.**

Respectfully submitted,


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